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Attorneys for Defendant  
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:23-CR-228-DJC
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
	) <b>JUDGMENT AND SENTENCING</b>
EDGAR ENRIQUE GARCIA-LOPEZ,	) Date: July 17, 2025
	) Time: 9:00 a.m.
	) Judge: Hon. Daniel J. Calabretta
<u>Defendant.</u>	)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Jason Hitt, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the previously scheduled Judgment and Sentencing set for July 17, 2025 be continued to September 11, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

1. On January 21, 2025, the Court continued Judgment and Sentencing at Mr. Garcia's request so that the government could extract data from his seized cellular phone (the phone was in the government's possession at the time, but no extraction had been completed) and allow him to review it for sentencing mitigation purposes. The government also agreed to produce ping data they

obtained pursuant to a search warrant. Mr. Garcia believes that the phone extraction and ping data may be relevant to formal PSR objections.

2. The government previously performed two failed cellular phone extractions.
3. On June 24, 2025, the government discovered a successful cellular phone extraction. It is a very large celebrite file. The government is also working on providing the ping data requested.
4. For the forgoing reasons, Mr. Garcia requires additional time to review the phone extraction and ping data prior to timely filing formal PSR objections. Good cause and compelling circumstances exist to continue the Judgment and Sentencing.
5. The government does not object to Mr. Garcia's continuance request.
6. The parties jointly request that the Judgment and Sentencing Schedule be modified as follows.

<b>Draft PSR</b>	completed
<b>Informal Objections</b>	completed
<b>Final PSR</b>	completed
<b>Formal Objections</b>	August 28, 2025
<b>Response to Formal Objections/Sentencing Memorandum</b>	September 4, 2025
<b>Judgment and Sentencing</b>	September 11, 2025, at 9:00 AM

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: July 11, 2025

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Garcia

1  
2 Date: July 11, 2025

MICHELE BECKWITH  
Acting United States Attorney

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4 /s/ Jason Hitt  
JASON HITT  
5 Assistant United States Attorney  
6 Attorneys for Plaintiff  
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**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: July 14, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE